

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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JENNIFER SHAWGO, an individual,  
JENNIFER SHAWGO BC LLC, a  
Minnesota limited liability company,  
MOLLY BJORNIE, an individual,  
MOLLY BJORNIE, LLC, a Minnesota  
limited liability company, AYESHA  
DAWLEY, an individual, DAWLEY,  
LLC, a Minnesota limited liability  
company, CAITY PIKE, an individual, on  
behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

COUNTER BRANDS, LLC d/b/a  
BEAUTYCOUNTER, a Delaware limited  
liability company, THE CARLYLE  
GROUP INC., a Delaware corporation,  
COUNTER BRANDS, INC. d/b/a  
BEAUTYCOUNTER, a Delaware  
corporation, G2G NEWCO, INC. d/b/a  
BEAUTYCOUNTER, a Delaware  
corporation, and SUSAN GREGG  
RENFREW, an individual,

Defendants.

Case No. 24-cv-00556 (PJS/TNL)

**DEFENDANTS COUNTER  
BRANDS, INC., G2G NEWCO, INC.,  
AND SUSAN GREGG RENFREW'S  
MOTION TO COMPEL  
ARBITRATION AND STAY  
PROCEEDINGS, OR TO DISMISS,  
STRIKE, OR TRANSFER**

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Defendants Counter Brands, Inc., G2G Newco, Inc., and Susan Gregg Renfrew  
("Defendants"), by and through their undersigned counsel, hereby move the Court for an  
order granting Defendants' Motion to Compel Arbitration and Stay Proceedings, or to  
Dismiss, Strike, or Transfer. This motion is made pursuant to Federal Rules of Civil

Procedure 12(b)(2), 12(b)(3), 12(b)(6), and 12(f), 28 U.S.C. § 1404(b), and the Federal Arbitration Act. This motion is supported by all files, records, and proceedings herein, including Defendants' supporting memorandum of law, exhibits, and the arguments of counsel.

Dated: August 16, 2024

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Brands, Inc.*